

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

DENISE SNYDER

Plaintiff

v.

UNITED STATES OF AMERICA

Defendants

Case No. 1:19-cv-770

Judge Sara Lioi

JOINT STATUS REPORT OF THE PARTIES

Per the Court's Case Management Plan (Doc. 15), the parties offer the following procedural joint status report.

(1) Discovery during this reporting period:

Defendant took the depositions of three (3) Ohio State Highway Patrol troopers who were involved in the investigation and/or reconstruction of the crash. In total, the Parties have now conducted twenty (20) discovery depositions. Fact witness depositions are now complete.

Defendant has designated a large number of documents as "Protected Material" under the Stipulated Protective Order. The Parties, after conferring by letter and phone conference, have been unable to resolve these issues. Plaintiff will file a motion with the Court.

(2) Settlement discussions during this reporting period:

None. Plaintiff's last demand was \$19,000,000 (subject to approval by the Cuyahoga County Probate Court). Defendant has made no offer of settlement.

(3) Motions that have been filed or remain pending during this reporting period:

Plaintiff Snyder, along with Plaintiff Bentley in the consolidated case, filed Plaintiffs' Motion for Ruling on Admissibility of No-Contest Plea. Defendant has filed its Brief in Opposition. Plaintiffs Snyder & Bentley have filed an Unopposed Motion for an Additional fourteen (14) days to file their Reply Brief.

(4) Developments potentially leading to case schedule deviations:

Other than potential future disruptions related to the Coronavirus pandemic, the Parties are not currently aware of any developments which could lead to a schedule deviation.

Respectfully submitted,

/s/Tom Merriman

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